

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CROWN CLOTHING CORPORATION,

Plaintiff,

v.

RANDCORE, INC., RAND INTERNATIONAL  
TRADING, INC., ANDRE BERNARD, AND  
RONALD BERNARD,

Defendants.

CIVIL ACTION NO. 05-CV-10049 (NG)

**RONALD BERNARD'S INITIAL DISCLOSURES  
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 26(a)(1)**

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure (the "Federal Rules"), defendant Ronald Bernard, by his undersigned counsel, hereby provides the following initial disclosures to plaintiff Crown Clothing Corporation ("Crown Clothing"). Ronald Bernard makes these disclosures based on information reasonably available to him at this time and reserves the right to modify, or otherwise supplement, these disclosures as discovery proceeds.<sup>1</sup>

**DISCLOSURES**

**RULE 26(a)(1)(A):**

Provide the name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.

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<sup>1</sup> By making these disclosures, Ronald Bernard does not waive his right to object to the production of any document, data compilation or tangible thing on the basis of privilege, work product doctrine, relevancy, undue burden or any other valid objection.

**RULE 26(a)(1)(A) DISCLOSURE:**

Ronald Bernard believes that the following individuals are likely to have discoverable information which supports his claims and/or defenses:

- (1) Ronald Bernard. Mr. Bernard resides at 444 East 82nd Street, New York, New York, 10028. Mr. Bernard's telephone number is (212) 988-8899.<sup>2</sup>
- (2) Any person or persons identified by Crown Clothing as having knowledge of matters pertaining to this litigation.
- (3) Any person or persons identified by defendants Andre Bernard, Randcore, Inc., or Rand International Trading, Inc. as having knowledge of matters pertaining to this litigation.
- (4) Any person or persons identified by Ronald Bernard during the course of discovery as having knowledge of matters pertaining to this litigation.

**RULE 26(a)(1)(B):**

Provide a copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses unless solely for impeachment.

**RULE 26(a)(1)(B) DISCLOSURE:**

Ronald Bernard may use any and all documents identified by Crown Clothing as pertinent to this litigation to support his claims and defenses. These documents are in the possession of Crown Clothing and/or defendants Andre Bernard, Randcore, Inc., and Rand International Trading, Inc.

**RULE 26(a)(1)(C):**

Provide a computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

**RULE 26(a)(1)(C) DISCLOSURE:**

Ronald Bernard does not claim any damages at this time.

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<sup>2</sup> Ronald Bernard can be contacted through undersigned counsel.

**RULE 26(a)(1)(D):**

Provide for inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

**RULE 26(a)(1)(D) DISCLOSURE:**

Ronald Bernard is unaware of any insurance agreements applicable to this dispute.

Dated: June 16, 2006

RONALD BERNARD, Defendant  
By his attorneys,

/s/ Gary R. Greenberg  
Gary R. Greenberg (BBO #209420)  
Annapoorni R. Sankaran (BBO #631065)  
James M. Vant (BBO #653616)  
Greenberg Traurig, LLP  
One International Place, 20th Floor  
Boston, MA 02110  
(617) 310-6000  
greenbergg@gtlaw.com  
sankarana@gtlaw.com  
vantj@gtlaw.com

**CERTIFICATE OF SERVICE**

I, James M. Vant, hereby certify that on June 16, 2006, I served a copy of Ronald Bernard's Initial Disclosures Pursuant to Federal Rule of Civil Procedure 26(a)(1) upon the following counsel of record via First Class U.S. Mail, or as otherwise indicated.

John C. Wyman, Esq.  
Ryan MacDonald, Esq.  
Murtha Cullina LLP  
99 High Street, 20th Floor  
Boston, Massachusetts 02110

Kenneth A. Kanfer  
Snitow Kanfer Holtzer & Millus LLP  
575 Lexington Avenue  
New York, New York 10022-6102

*Via Hand Delivery*

/s/ James M. Vant

James M. Vant